

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES E. SHELTON, individually and on behalf of all others similarly situated,)	
Plaintiff,)	Case No. 23-cv-01240-JLS-AHG
)	
v.)	
)	
FREEDOM FOREVER, LLC,)	
)	
Defendant.)	
)	

DECLARATION OF STEVEN WYSONG

I, Steven Wyson, hereby make this declaration under penalty of perjury pursuant to 28 U.S.C. § 1746, and declare as follows:

1. I have personal knowledge of the following facts and would testify to them if called as a witness in a court of law. This Declaration is based upon my personal knowledge.
2. I am the Compliance Support Specialist for Freedom Forever, LLC (“Freedom Forever”).

3. Freedom Forever is headquartered, and maintains its principal offices, in Temecula, Riverside County, California.
4. Freedom Forever's Executive team is based in Lake Forest, California, and Temecula, California, which are located in the Central District of California. The policies generated by the Executive Team are largely developed, maintained, and implemented by personnel located in and Temecula, California.
5. Freedom Forever's relevant policies and practices were developed and implemented in Temecula, California.
6. Documents (both electronic and hard copy) are, for the most part stored at Freedom Forever's headquarters in Temecula, California. Business records and transactional databases are located at Freedom Forever's headquarters in Temecula, California.
7. The majority of Freedom Forever's key employees who have knowledge or information that relates to the claims made in this case and to Freedom Forever's defenses to those claims are located at or within 35 miles of Freedom Forever's headquarters in Temecula, California. None of these individuals work or live in Pennsylvania.

FURTHER AFFIANT SAYETH NOT.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Steven Wysong
Steven Wysong

10/1/2024
Date

